



Sprint Nextel
Mailstop VARESP0403-A4134
2001 Edmund Halley Drive
Reston, Virginia 20191

Kent Y. Nakamura
Vice President and
Chief Privacy Officer

December 11, 2006

Via Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Notice of Ex Parte Communication
CC Docket No. 96-115; RM 11277

Dear Ms. Dortch:

This letter is to inform you that on December 8, 2006, Kent Nakamura, Luisa Lancetti and Frank Triveri of Sprint Nextel Corporation (“Sprint Nextel”) met separately with Michelle Carey of Chairman Martin’s office; Scott Bergmann and Chris Reichman of Commissioner Adelstein’s office; Bruce Gottlieb and John Branscome of Chairman Copps’s office; and Tom Navin, Julie Veach, Marcus Mayer, Adam Kirschenbaum, and Melissa Kirkel of the Wireline Competition Bureau to discuss the Commission’s *Notice of Proposed Rulemaking* in the above-referenced proceedings. Sprint Nextel urged the Commission to:

- Not require carriers to “reinitialize” online accounts if it would effectively lock customers out of their online accounts pending account password validation. The risk of sending validating information to the customer’s address, where it may be intercepted (e.g., by perpetrators of domestic abuse, or untrusted business partners), along with the massive inconvenience to customers, outweighs the benefit of reinitializing all online accounts. Sprint Nextel already plans to transition customers away from using a part of social security number as authenticating information, as customers transact business with Sprint Nextel.
- Provide flexibility in any new authentication rules and allow carriers to adopt different forms of authentication depending on the needs of the customer. So long as the means of authentication are reliable, the Commission should allow different forms of authentication to enable carriers to meet their customers’ demands for convenience. As part of Sprint Nextel’s planned 2007 authentication upgrade, Sprint Nextel plans to authenticate customers with (1) passcodes, (2) personal identification numbers, (3) shared-secret questions and answers (e.g., what was the name of your second-grade teacher?), (4) government-issued photographic identification, (5) service- or invoice-specific questions that only the account holder could reasonably be expected to know, (6)

dedicated avenues of contact (e.g., a customer's assigned account representative and phone number), which would not be known to the public or pretexters, and (7) calls that Sprint can validate as originating from a Sprint Nextel device of record.

- Give carriers sufficient time to implement any new authentication rules. At a minimum, Sprint Nextel's implementation of its planned 2007 authentication upgrades must extend into 2008 because of (1) the size of Sprint Nextel's customer base (51 million customers), (2) the time to develop and test software upgrades, (3) the effort required to notify customers of new authentication, and (4) the effort required to transition those customers to new authentication.
- Apply any mandatory password requirement only to the disclosure of call-detail records via telephone (the object of pretexters).
- Allow carriers to choose between implementing any such mandatory password regime or prohibiting the disclosure of call-detail records via telephone. Either solution would address pretexting.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please associate this letter with the file in the above-referenced proceedings.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kent Y. Nakamura", with a long horizontal line extending to the right.

Kent Y. Nakamura
Vice President and Chief Privacy Officer

cc: Michelle Carey
Scott Bergmann
Chris Reichman
Bruce Gottlieb
John Branscome
Tom Navin
Julie Veach
Marcus Mayer
Adam Kirschenbaum
Melissa Kinkel
William Dever
Timothy Stelzig
Jonathan Reel
Cindy Spiers